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Via ECF

Honorable Katherine Polk Failla
United States District Court, Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Chenming Holdings (Hong Kong) Limited v. Sklarov et al.*, Case No. 1:24-cv-00935-KPF

Dear Judge Failla:

This Firm is counsel to Plaintiff Chenming Holdings (Hong Kong) Limited in the above-referenced action. Pursuant to Rule 9(A) of Your Honor's Individual Practices and Rule 21.7 of the Electronic Case Filing Rules & Instructions ("ECF Rules"), Plaintiff respectfully requests the sealing of the filed documents set forth herein which contain certain bank account numbers of defendants.

Federal Rule of Civil Procedure 5.2(a) requires that a party making a public filing containing "a financial-account number" may include only the last four digits of the financial-account number. It has recently been brought to our attention that certain filed documents disclose bank account numbers without the necessary redaction.

In accordance with Rule 21.7 of the ECF Rules, Plaintiff contacted the ECF Help Desk requesting the immediate and temporary sealing of these documents. Upon Your Honor's approval, Plaintiff will electronically file redacted versions (redacting only portions of the bank account numbers as required by Fed. R. C. P. 5.2(a)) of the following documents. *See Zou v. Han*, No. 23CV02370JMAJMW, 2024 WL 1704704, at *7 (E.D.N.Y. Apr. 19, 2024) ("afford[ing] parties the opportunity to replace and re-file the documents [containing defendant's full bank account number] subject to the appropriate redactions in accordance with Fed. R. Civ. P. 5.2(a)").

The documents containing bank account numbers are:

- ECF No. 001
- ECF No. 009
- ECF No. 009-2
- ECF No. 009-3
- ECF No. 009-4
- ECF No. 009-5
- ECF No. 030
- ECF No. 080
- ECF No. 080-1
- ECF No. 080-2
- ECF No. 080-9
- ECF No. 081



- ECF No. 089

We apologize for any inconvenience to the Court. We have moved expeditiously upon learning that certain information had been mistakenly disclosed without proper redaction. In light of the foregoing, Plaintiff respectfully requests that Your Honor order the formal sealing of the foregoing documents and permit Plaintiff to re-file redaction versions.

Dated: December 19, 2024

Respectfully submitted,
KING & WOOD MALLESONS LLP

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